

Workshop Questions Directed to Karl Wardin

AT&T Question No. 1:

Your attachments do not contain the subloop rates SBC intends to offer in Illinois for the following subloop types – these subloop types are missing from Column N of Attachment WKW-2A. What rates does SBC intend to offer in Illinois for these subloop types consistent with the methodology proposed in Mr. Wardin’s affidavit:

4-wire DS-1 (1.544 Mbps) subloop
 -MDF or CO to SAI/FDI
 -MDF or CO to Terminal

2-wire 160 Kbps (ISDN-BRI)
 -MDF or CO to SAI/FDI
 -MDF or CO to Terminal

SBC Illinois Response to AT&T Question No. 1:

Mr. Wardin did not include the subloop types mention in AT&T Question No.1 in his analysis since those subloop types were not identified in Staff’s Proposed Remedial Actions Attachment A and therefore was not required. The Phase I Interim Order on Investigation, at paragraph 719 states:

Having reviewed these recommendations, and taking full account of the arguments presented, we agree that Ameritech must demonstrate that the “interim” rates shown in Attachment A to Supplement to Updated Summary of Staff’s Proposed Remedial Actions For Ameritech Illinois, (filed on Nov. 27, 2002) are reasonable (as discussed above).

Although an analysis is not required by the Commission’s Phase I Order, Mr. Wardin will include these subloop types consistent with the methodology proposed in Mr. Wardin’s affidavit. The chart below depicts that methodology. Mr. Wardin also would like to highlight that these subloop types, identified in AT&T’s Question No 1, are not available in Texas, California or Michigan thereby making comparisons meaningless. Mr. Wardin recommends using the existing interim rates during the pendency of the subloop investigation. Further, Mr. Wardin states that there are not subloops of any type in use by CLECs in Texas or California. In the SBC Midwest states of Illinois, Indiana, Michigan, Ohio, and Wisconsin only in Ohio have subloops of any type been ordered by CLECs which have been approximately a total of 6.

Column A	Column B	C	Column D	Column E	Column F	Column G	Column H	Column I	Column J	Column K	Column L	Column M	Column N
UNE	TYPE	Type	IL Sub-Loop Rate	IL Unbundled Loop rate	Percent of Sub-loop (F=D/E)*100	CA Sub-Loop Rate	CA Unbundled Loop rate	Percent of Sub-loop (I=G/H)*100	MI Sub-Loop Rate	MI Unbundled Loop rate	Percent of Sub-loop (L=J/K)*100	Lowest Percentage (F, I, L)	Proposed IL Sub-Loop Rate (M*E)

4-Wire DS-1(1.544 Mbps) Sub-Loop													
- MDF or CO to SAI/FDI - Access Area A	R	\$ 27.60	\$ 73.46	38%	N/A	\$ 94.43	N/A	N/A	\$ 34.66	N/A	38%	\$ 27.60	
- MDF or CO to SAI/FDI - Access Area B	R	\$ 57.76	\$ 61.45	94%	N/A	\$ 94.43	N/A	N/A	\$ 41.57	N/A	94%	\$ 57.76	
- MDF or CO to SAI/FDI - Access Area C	R	\$ 62.26	\$ 61.56	101%	N/A	\$ 94.43	N/A	N/A	\$ 47.26	N/A	101%	\$ 62.26	
- MDF or CO to Terminal-Access Area A	R	\$ 28.44	\$ 73.46	39%	N/A	\$ 94.43	N/A	N/A	\$ 34.66	N/A	39%	\$ 28.44	
- MDF or CO to Terminal-Access Area B	R	\$ 73.52	\$ 61.45	120%	N/A	\$ 94.43	N/A	N/A	\$ 41.57	N/A	120%	\$ 73.52	
- MDF or CO to Terminal-Access Area C	R	\$ 86.50	\$ 61.56	141%	N/A	\$ 94.43	N/A	N/A	\$ 47.26	N/A	141%	\$ 86.50	
2-Wire 160Kbps (ISDN-BRI) Sub-Loop													
- MDF or CO to SAI/FDI - Access Area A	R	\$ 4.52	\$ 2.71	167%	TBD	\$ 4.44	N/A	N/A	\$ 10.29	N/A	167%	\$ 4.52	
- MDF or CO to SAI/FDI - Access Area B	R	\$ 11.36	\$ 8.88	128%	TBD	\$ 4.44	N/A	N/A	\$ 11.17	N/A	128%	\$ 11.36	
- MDF or CO to SAI/FDI - Access Area C	R	\$ 13.82	\$ 13.68	101%	TBD	\$ 4.44	N/A	N/A	\$ 14.89	N/A	101%	\$ 13.82	
- MDF or CO to Terminal-Access Area A	R	\$ 4.51	\$ 2.71	166%	TBD	\$ 4.44	N/A	N/A	\$ 10.29	N/A	166%	\$ 4.51	
- MDF or CO to Terminal-Access Area B	R	\$ 15.65	\$ 8.88	176%	TBD	\$ 4.44	N/A	N/A	\$ 11.17	N/A	176%	\$ 15.65	
- MDF or CO to Terminal-Access Area C	R	\$ 22.50	\$ 13.68	164%	TBD	\$ 4.44	N/A	N/A	\$ 14.89	N/A	164%	\$ 22.50	

AT&T Question No. 2:

Will the “NID Only” charge remain a \$0 charge for all subloop types?

SBC Illinois Response to AT&T Question No. 2:

Yes, the “NID Only” charge will remain at \$0. The Commission’s Interim Order at paragraph 719 states:

...”The arguments further persuade us, however, that SBC Illinois need not make any such showing with respect to the following rates: (1) those interim rates currently set at zero, (2) access to AIN database rates, (3) the “record work only” charge, (4) recurring COPTS port charges, and (5) Broadband UNE rates. The Commission finds that these rates are *prima facie* reasonable and further believes that no useful purpose would be served by requiring SBC Illinois to undertake a “zone of reasonableness” analysis for these rates.”

Therefore, a zone of reasonableness showing is not required for NIDs.